

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official  
capacity as President of the United States of  
America, et al.,

Defendants.

NO.

DECLARATION OF  
ELBE SEATON

DECLARATION OF ELBE SEATON

ATTORNEY GENERAL OF WASHINGTON  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744

1 I, Elbe Seaton, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make  
3 this declaration based on my personal knowledge.

4 2. I live in Spokane, Washington, with my husband and two children.

5 3. Me and my husband have been together for 17 years, and we have lived in  
6 Spokane for most of our lives. We own a small business that provides lawn care. My husband  
7 runs the business, and I do the bookkeeping. This arrangement provides me the opportunity to  
8 work from home and home school my children, which is something I always desired to do.

9 4. My oldest daughter is 14 years old, and she is transgender. She was designated  
10 male at birth, but her gender identity is female.

11 5. I'm choosing to refer to my daughter as "Minor A" in this declaration because I  
12 do not wish to involve her in these legal proceedings and use her name without her consent.

13 6. Since she was little, Minor A favored things that are traditionally feminine. For  
14 example, she loved the color pink, was obsessed with Minnie Mouse, and would correct you if  
15 you called her handsome, calling herself "pretty" instead. We were open to her preferences and  
16 supported her choices. But she was still being identified as a boy.

17 7. When Minor A was around four and half or five years old, her mental health  
18 started to decline. She didn't want to leave the house, she cried more often than normal and  
19 seemed depressed. It was hard for us as parents to understand what was going on with our small  
20 child.

21 8. Certain daily tasks became challenging. She was having trouble seeing her naked  
22 body, she wouldn't want to bathe without a bathing suit on. Dressing herself often led to  
23 meltdowns because she insisted all her clothes were ugly and she was ugly in them. At five years  
24 old she exclaimed to me that she "wanted to rip all her skin off."

25 9. During her frequent crying outbursts, Minor A would talk about her head being  
26 broken. She would repeat to me: "Mommy, my head is broken." I tried to be supportive, I told

1 her I would be there for her and we would figure it out together, even though I didn't understand  
2 what exactly was bothering her. We took her to counseling, but it wasn't especially helpful to  
3 her.

4 10. It wasn't until she was seven years old, after she was mistaken for a girl in public,  
5 that we had a very specific conversation. I asked her what she felt the difference was between  
6 being a boy who liked girl things and being a girl and she said she wasn't sure because she wasn't  
7 a boy who liked girl things. She said that she was a girl.

8 11. She had struggled to tell me because she was afraid she would hurt my feelings.  
9 I frequently told her her birth story, about how she was just over 10 pounds and immediately  
10 pooped into my hand, but I didn't even notice because my "beautiful baby boy" was finally here.  
11 She was afraid that I would be disappointed she wasn't my "beautiful baby boy" anymore. I told  
12 her that her being a boy was the least important part of the story. She being in my life was the  
13 important part.

14 12. We supported her social transition, changed her name and started using she/her  
15 pronouns to refer to Minor A. Once we made these changes and we told people that Minor A  
16 was a girl, her mental health improved tremendously. We got our happy go lucky kid back. It  
17 was like a night and day transformation.

18 13. Finding a community of parents of transgender kids in Spokane was not easy. A  
19 group that had formed a while back had dissolved. I decided to re-start it myself and lead the  
20 group for three and half years. It became our safe place to congregate parents of transgender and  
21 LGBTQ children, to share our stories, support one another and get resources and guidance. It  
22 has been immensely helpful to have people that make you feel you are not in this alone, and have  
23 our feelings validated.

24 14. We were lucky to get accepted as patients of one of the few pediatricians in  
25 Spokane that specializes in transgender youth. This doctor has been incredibly helpful and  
26 guiding light for my daughter and me.

1           15.     When Minor A started having questions about puberty blockers, her doctor and I  
2     did all we could to reassure her that she would start them when the moment was right, that  
3     puberty didn't happen overnight, and she would not miss her window. Still, her anxiety towards  
4     adolescence and its physical changes remained. She started having nightmares about waking up  
5     one day and her body being one of a man. She started seeing a counselor again, but this time one  
6     who had experience with patients with gender dysphoria.

7           16.     When it was the right time, Minor A started treatment with puberty blockers. She  
8     has been on them for a year and a half. I am very certain that this medicine has saved my child's  
9     life, she would not have tolerated going through puberty without them.

10          17.     She is now approaching the age when she would start hormone replacement  
11     therapy and take estrogen. She is very excited about this time in her life. Like any other girl her  
12     age, she is daydreaming about how her body will change. She is eager to develop alongside her  
13     peers and fit in like an average teenager.

14          18.     For most of her life, I have been able to shield Minor A from the hate that exists  
15     in the world towards people like her. Last year she decided she wanted to attend public high  
16     school. She is old enough now to have a smart phone. This exposure to the outside world has  
17     shown her the large amount of people who despise her existence, that hate her just for being who  
18     she is. It has hurt her tremendously. She fears for her physical safety. She won't take public  
19     transport without a friend by her side and pepper spray in her pocket. Since the November  
20     election, the atmosphere in our home has been heavy. Minor A sees the headlines and knows of  
21     the current government policies against transgender people. She now fears for her medical safety  
22     as well.

23          19.     If the Executive Order that aims to restrict gender care is not stopped, and my  
24     daughter cannot access gender-affirming care, I am afraid she would not survive.

25          20.     Fearing this scenario, our family has started taking steps to be prepared to leave  
26     the country when transgender care becomes unavailable. We contacted a friend that lives in

1 another country to see what jobs my husband could have access to. We have updated our passport  
2 and identity documents.

3 21. We are very scared about the prospect of leaving the only home our children have  
4 ever known. My husband and I have never been outside of the country. We don't want to leave  
5 our business, our house, and our extended families. Moving to another country due to the  
6 consequences of the Executive Order would impact our emotional wellbeing and finances  
7 negatively. But we would have no other option if staying would cost my daughter's life.

8 I declare under penalty of perjury under the laws of the State of Washington and the  
9 United States of America that the foregoing is true and correct.

10 DATED this \_\_\_\_ day of February 2025 at \_\_\_\_\_, Washington.

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13 ELBE SEATON  
14 Parent of Minor A  
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10 DATED this 3<sup>rd</sup> day of February 2025 at Spokane, Washington.

11 Elbe Seaton  
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13 Parent of Minor A  
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